

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CURLING PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO RESPOND TO STATE DEFENDANTS' MOTION AND  
INCORPORATED BRIEF**

Curling Plaintiffs respectfully request a short extension of five days to respond to the Motion by State Defendants to Clarify or Modify the March 18 Order (Dkt. 1349). This would extend the deadline for Curling Plaintiffs' response from April 6 to April 11. *See* LR 7.1(B), NDGa. State Defendants have indicated they do not object to this requested extension.

The extension is needed for multiple reasons. First, Curling Plaintiffs' lead counsel, Mr. Cross, has been and will be traveling during much of the 14-day response period for personal and professional reasons, including a hearing on the West Coast. Mr. Knapp has been in trial all of last week and will be preparing for another trial shortly. Second, this motion concerns events that occurred well over a

year ago, and Curling Plaintiffs – in particular Mr. Cross and Mr. Knapp, who are included on emails material to this motion – need time to go back and compile the facts of what actually occurred in light of the misstatements in State Defendants' filing and their extraordinary allegations of unethical conduct by Curling Plaintiffs' counsel.

A proposed order is attached.

Respectfully submitted, this 30th day of March, 2022.

/s/ David D. Cross

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross  
David D. Cross

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 30, 2022, a copy of the foregoing **Curling Plaintiffs' Unopposed Motion for Extension of Time to Respond to State Defendants' Motion and Incorporated Brief** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross  
David D. Cross